



February 4 2026

Re: Suspect Soil Reuse Criteria Memo
Proposed Development
East Broadway Boulevard
Sedalia, Missouri 65301

In response to discovered petroleum impacted soil within the project's planned detention basin footprint, the below outlines suspect soil reuse criteria to be applied to soils within the area of concern. These guidelines are consistent with the project's Soil & Groundwater Management Plan (SGMP) and are intended to provide clear direction in the field.

Low-level petroleum impacted soil generated during excavation may be reused onsite under controlled conditions, provided the following requirements are met:

1. **Subsurface Placement Only**
 - Impacted soil may only be reused below grade.
 - A minimum of one foot of clean soil cover must be maintained over any reused impacted material.
2. **Utility Trench Restrictions**
 - Impacted soil may not be used as bedding material directly around storm or sanitary piping.
 - Clean imported material shall be used for pipe bedding and the immediate backfill envelope surrounding utilities.
3. **50-Foot Building Buffer**
 - Impacted soil shall not be placed within 50 feet of any occupied building or structure.
 - Within this 50-foot buffer, only clean soil may be used for backfill.
4. **No Surface Exposure**
 - Impacted soil is not to be placed at grade, in landscaped areas, or in any location where it could be directly contacted.
5. **Field Screening and Oversight**
 - All reuse decisions will be made based on field screening (PID readings), visual observations, odor, and confirmation sampling where needed.

Material Requiring Off-Site Disposal

Soil exhibiting any of the following conditions will be directed to landfill disposal rather than reused onsite:

- Strong petroleum odors or visible staining
- Elevated PID readings indicating significant impact
- Material that fails confirmation sampling
- Impacted soil located within the 50-foot building buffer

Use of Clean Soil

Suspect soil that is confirmed clean through field screening and/or laboratory data may be reused anywhere onsite without restriction, including within the 50-foot building buffer.

These criteria are derived from the project SGMP and are intended to provide a straightforward framework so that excavation can proceed without unnecessary delays while remaining protective and compliant.

We trust this letter is responsive to your needs. If you have any questions or need any additional information, please do not hesitate to contact us at your convenience.

Sincerely,

AP Engineering & Consulting, Inc.



Cameron Abbott, CHMM
Director of Operations